

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

THE TAXIS FOR ALL CAMPAIGN, a nonprofit organization, DR. SIMI LINTON, an individual, UNITED SPINAL ASSOCIATION, a nonprofit organization, 504 DEMOCRATIC CLUB, a nonprofit organization, DISABLED IN ACTION, a nonprofit organization,

Plaintiffs,

-against-

NEW YORK CITY TAXI AND LIMOUSINE COMMISSION, a charter mandated agency, MEERA JOSHI, in her official capacity as chairman and commissioner of the New York City Taxi and Limousine Commission, THE CITY OF NEW YORK, and BILL DE BLASIO, in his official capacity as Mayor of the City of New York,

Defendants.

Case No. 11-cv-0237 (GBD)

**NOTICE OF MOTION TO ENFORCE
THE CLASS SETTLEMENT
STIPULATION AND AMENDED
CLASS SETTLEMENT STIPULATION**

PLEASE TAKE NOTICE THAT, upon Plaintiffs' Memorandum of Law in Support of Motion to Enforce the Class Action Settlement and Amended Class Settlement Stipulation and Declaration of Daniel L. Brown, dated February 20, 2024, Plaintiffs, by and through its counsel SHEPPARD, MULLIN, RICHTER & HAMPTON, LLP and DISABILITY RIGHTS ADVOCATES, shall move before the Honorable George B. Daniels, U.S.D.J., at the United States Courthouse, 500 Pearl Street, Courtroom 11A, New York, New York 10007, on a date and time to be determined by the Court, for an Order: Plaintiffs respectfully request that the Court issue an order: (i) enforcing, and directing Defendants to specifically perform under, the Class Settlement Stipulation and the Amended Class Settlement Stipulation; (ii) granting Plaintiffs

attorneys' fees and costs in bringing this motion; and (iii) granting such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with Local Rule 6.1(b), opposition papers to this motion shall be served "within fourteen days after service of the moving papers," and reply papers shall be served "within seven days after service of the answering papers."

Dated: New York, New York
February 21, 2024

Respectfully submitted,

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By: /s/ Daniel L. Brown
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